



U.S. Department of Justice

United States Attorney  
Southern District of New York

86 Chambers Street  
New York, New York 10007

February 16, 2024

**By ECF**

The Honorable Edgardo Ramos  
United States District Judge  
Thurgood Marshall United States Courthouse  
40 Foley Square  
New York, NY 10007

**MEMO ENDORSED**

Re: *Haitian Bridge Alliance et al. v. U.S. Department of Homeland Security et al.*, No. 22 Civ. 8344 (ER)

Dear Judge Ramos:

We represent defendants U.S. Department of Homeland Security, U.S. Customs and Border Protection, and U.S. Immigration and Customs Enforcement (collectively, the “DHS Defendants” or the “Government”), in the above-referenced action brought pursuant to the Freedom of Information Act, 5 U.S.C. § 522, *et seq.* We write to respectfully request an adjournment of the court conference currently scheduled for February 22, 2024. *See* ECF No. 78. The reason for this request is that counsel for the Government will be out of the office due to previously scheduled commitments on February 22. Plaintiffs consent to this request, and all parties are available for a conference on February 29 or March 6, 2024, if either of those dates is convenient for the Court.

We thank the Court for its consideration of this request.

The status conference is adjourned to February 29, 2024 at 11:30 a.m. The parties are reminded to call (877) 411-9748 and enter access code 3029857#. SO ORDERED.

Edgardo Ramos, U.S.D.J.

Dated: 2/20/2024

New York, New York

Respectfully,

DAMIAN WILLIAMS  
United States Attorney

By: /s/ Dana Walsh Kumar  
Dana Walsh Kumar  
Tomoko Onozawa  
Assistant United States Attorneys  
Tel.: (212) 637-2741/2721  
Dana.Walsh.Kumar@usdoj.gov  
Tomoko.Onozawa@usdoj.gov

cc: Plaintiffs' Counsel (By ECF)